



January 27, 2025

VIA ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York, 10007

RE: *Austin Community College District v. XL Insurance America, Inc.*
Case No. 24-cv-00603 (S.D.N.Y.)

Dear Magistrate Judge Figueredo:

Pursuant to your Honor's Order [ECF No. 26], the parties to this litigation, Plaintiff Austin Community College District ("ACC") and Defendant XL Insurance America, Inc. ("XL"), respectfully submit this joint letter proposing a six-month extension of the discovery deadline currently set for January 30, 2025. This will allow XL to make production of the documents at issue, permit ACC to review that production and pursue any follow-up as necessary, and, provided that process is completed within a reasonable time frame, allow sufficient further time for the parties to complete third-party discovery, exchange any expert reports, and take all relevant depositions.

The Honorable Valerie Figueredo
 January 27, 2025
 Page 2 of 2

The parties respectfully propose the following deadlines be put in place for the remainder of discovery:

Event	Proposed Deadline
Plaintiff's Expert Report Due	May 1, 2025
Defendant's Expert Report Due	June 1, 2025
End of Discovery (both fact and expert)	July 30, 2025
Joint Pre-Trial Order Due	October 30, 2025

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Alexander Shapiro
 Alexander H. Shapiro

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